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Attorney for Plaintiff RAJA KANNAN

**United States District Court  
Northern District of California**

RAJA KANNAN,	)	Case No: 17-CV-07305-EJD (VKD)
	)	
Plaintiff,	)	<b>DECLARATION OF KANNAN RE</b>
	)	<b>DISCOVERY DISPUTE</b>
vs.	)	
	)	
APPLE, INC.,	)	
	)	
Defendants	)	
	)	
	)	
	)	
	)	

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The undersigned Plaintiff Raja Kannan, hereby declares and states:

1. I am the Plaintiff the above-referenced matter. I submit this declaration pursuant to the Order of this Court entered October 22, 2019. The matters set forth herein are known to me of my own personal knowledge except as to those matters stated on information and belief and as to those matters I believe them to be true.

2. The only apps I developed during the time I have worked for Apple have been for Apple itself. My manager at Apple was well aware of this work and it was part of my job. My app was adopted and used within Apple. This included SafeSHELL, SafeSQL & CR Logging Tool. I produced documents I my possession concerning this app on September 9,

Decl. of Kannan re Discovery

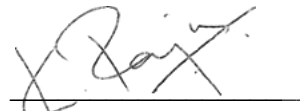
2019. These are all the documents I have concerning my development of any app while employed at Apple.

3. My wife has developed apps while I was working for Apple. She did not use my laptop issued by Apple to develop any app. However, she did use my laptop to save app development files and data as a backup. She did not otherwise use the laptop in developing any app. The tool to develop the apps functioned in the Microsoft Windows operating system only and not in the Apple Mac operating systems.

4. On Friday, October 25 we provided Apple with a list of files on my laptop which relate to my wife's app development. These were based on the list produced by Apple and attached to the July 8 letter from Mr. Boyer. On October 25 we also uploaded all the files on the list to a Dropbox folder and gave a link to that folder to the attorneys for Apple so they could access. However, Apple already had copies of the files for many months from the backups of my laptop.

5. I have read the forgoing declaration consisting of this and one other page and I hereby declare under penalty of perjury that it is true and correct to the best of my knowledge.

Dated this 28<sup>th</sup> day of October, 2019

  
Raja Kannan

CERTIFICATE OF SERVICE

I am over the age of 18 and am not a party to the above-captioned matter.

On October 28, 2019 I served the documents listed below on the Defendant by automatic electronic transmission via the Court's Case Management and Electronic Case Filing practice as follows:

TODD K. BOYER, Bar No. 203132  
[todd.boyer@bakermckenzie.com](mailto:todd.boyer@bakermckenzie.com)

CAROLINE A. PHAM, Bar No. 305080  
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Baker McKenzie LLP  
660 Hansen Way  
Palo Alto, CA 94304

The documents served on October 28, 2019 are:

**DECLARATION OF KANNAN RE DISCOVERY DISPUTE**

Dated this 28<sup>th</sup> day of October 2019.



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Karen E. Ford Esq  
Attorney for Plaintiff